

**RECEIVED**

**JUL - 3 2025**  
**U. S. DISTRICT COURT**  
**EASTERN DISTRICT OF MO**  
**ST. LOUIS**

**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF MISSOURI**  
**EASTERN DIVISION**

**DONNELL SIMS,**

**Plaintiff,**

**v.**

**No. 4:25-CV-796-JSD**

**SOUTHWEST AIRLINES CO. and**  
**JANEEN UNKNOWN,**

**Defendant.**

**PLAINTIFFS' MOTION TO COMPEL INITIAL DISCLOSURES UNDER RULE**  
**RULE 26 (a)**

**COMES NOW**, Plaintiff, Donnell Sims, and for his Motion for Discovery, states as follows:

1. Plaintiff filed his Verified Complaint for damages on May 30, 2025.
2. On June 9, 2025, Plaintiff filed an executed summons return, indicating that Defendant Southwest Airlines Co. et al was served process on June 6, 2025.
3. On June 27, 2025, Defendant Southwest Airlines Co. et al filed "Answer of Defendant, Southwest Airlines Co., et al, to Plaintiff's Verified Complaint for Damages."
4. In lieu of Defendant Southwest Airlines Co., et al's Answer, Plaintiff herein submits his medical records (partial, due to physical therapy and other treatments not being completed) as Plaintiff's Exhibit "1."
5. Plaintiff herein submits an "Affidavit of Fact" from Southwest Airlines Flight No.# WN4379 passenger Alfonso Guevara, as Plaintiff's Exhibit "2."

6. Plaintiff herein submits ST LO. INTL. AIRPORT POLICE DEPARTMENT INVESTIGATIVE REPORT 25 – 17679 – ORIGINAL, which clearly documents Plaintiff's fall on the Southwest Airlines Flight WN4379, and the fact that the Emergency Medical Service (EMS) – 1 was called, dispatched and waiting for Plaintiff when the plane landed at Lambert St. Louis International Airport. SEE, Plaintiff's Exhibit "3."

### **DISCOVERY**

7. Plaintiff incorporates Paragraphs 1 through 6 as though fully set forth herein.
8. Plaintiff herein request the Honorable Court Order Defendant(s) to disclose Flight Attendant Jannen (Last Name Unknown), the flight attendant who spilled the ice and liquid onto passenger Abby Steffens and the floor of the plane, last name to Plaintiff.
9. Plaintiff herein request the Honorable Court to Order Defendant(s) to disclose Flight Attendant Sabrina (Last Name Unknown), the flight attendant who gave Plaintiff Tylenol and called EMS, last name to Plaintiff.
10. Plaintiff herein request the Honorable Court allow Plaintiff to depose Flight Attendant Janeen (LNU).
11. Plaintiff herein request the Honorable Court allow Plaintiff to depose Flight Attendant Sabrina (LNU).
12. Plaintiff herein request the Honorable Court allow Plaintiff to submit written interrogatories for Flight Attendant Janeen (LNU) and further compel Flight Attendant Janeen (LNU) to answer said interrogatories.
13. Plaintiff herein request the Honorable Court allow Plaintiff to submit interrogatories to Flight Attendant Sabrina (LNU) and further compel Flight Attendant Sabrina (LNU) to answer Plaintiff's written interrogatories.
14. Plaintiff herein request the Honorable Court to compel Defendant Southwest Airlines Co., et al to disclose any and all recorded communications, calls and transmissions between St. Louis Lambert Airport Police Department and Southwest Airlines Co., Flight WN4379 crew.
15. Plaintiff herein request the Honorable Court to compel Defendant Southwest Airlines Co., et al to disclose any and all recorded communications, calls, and transmissions between EMS and Southwest Airlines Co., Flight WN4379 crew.

**WHEREFORE,** Plaintiff prays that the Honorable Order Defendants to Disclosure.

Respectfully submitted,



Donnell Sims

Plaintiff pro se

1-314-319-5113

2161 Thurman Ave. # G

St. Louis, MO 63110

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on July 3, 2025 the foregoing was mailed via U.S. Postal Service, returned certified receipt to attorney(s) for Defendant at:

Attorney Leo W. Nelsen  
1699 S. Hanley Rd., Suite 210  
St. Louis, Missouri 63144

